

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America

v.

JIMMY LEE BROOKS

Case No. M-20- 139 -SM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 18, 2020 in the county of Oklahoma in the
Western District of Oklahoma, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Chad R. Oubre Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF),
 which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.*Complainant's signature*

Chad R. Oubre, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/30/2020*Judge's signature*City and state: Oklahoma City, Oklahoma

Suzanne Mitchell, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

State of OKLAHOMA)
)
County of OKLAHOMA)

AFFIDAVIT

I, Chad R. Oubre, being duly sworn, depose, and state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), a division of the United States Department of Justice, having been so employed since December 2009. I am a graduate of the Department of Homeland Security's Criminal Investigator Training program as well as the ATF Special Agent Basic Training Program. As a Special Agent with ATF, I am vested with the authority to investigate violations of Federal laws including Title 18 of the United States Code.

2. I have been assigned to the ATF Oklahoma City Field Office since July 2010. I am familiar with the information contained in this affidavit through personal investigation and/or information received from other law enforcement officers, mentioned herein, who have participated in and/or have contributed documentary reports of their

investigative efforts in this matter. This affidavit contains information necessary to support the Complaint and is not intended to include every fact or matter observed or known by me.

PROBABLE CAUSE

3. Around 6:45 p.m. on March 18, 2020, Oklahoma City Police Department (OCPD) officers were dispatched to Mid K Beauty Supply at 1803 NE 23rd Street, Oklahoma City, Oklahoma, regarding a “disturbance.” When officers arrived, they learned that a female, later identified as Shante Jackson, and the suspect, later identified as **Jimmy Lee BROOKS** (DOB: xx/xx/1985, SSN: xxx-xx-5508) (**BROOKS**), had already left the scene. Officers learned that Jackson and **BROOKS** had gotten into an altercation that began inside the MK Beauty Supply store and continued in the parking lot. High-quality surveillance footage from the store captured a large portion of the incident. Officers then reviewed that footage.

4. The video footage shows **BROOKS** and Jackson exiting the store. It appears they are arguing. Jackson enters the driver’s side door of a 2000s model Chevrolet. (Police have since confirmed the vehicle was

a Chevrolet Impala.) **BROOKS** is standing in front of the Impala at the hood, and it appears that they continue to argue.

5. **BROOKS** then pulls out a large knife and appears to threaten Jackson. He tries to enter the vehicle, but it appears she has locked **BROOKS** out of the vehicle. **BROOKS** then begins punching the window, as if attempting to break it.

6. Jackson then crawls across to the passenger side of the vehicle and escapes through the passenger door. Jackson fled on foot and was picked up by an unknown individual driving a black vehicle. As Jackson leaves the scene in the black vehicle, **BROOKS** retrieves a handgun from inside the Chevrolet Impala and fires several shots toward the black vehicle as it drives away. Law enforcement provided a still photograph to me that purports to show **BROOKS** firing at the vehicle.

7. Around 7:15 p.m., officers received information that Jackson had self-reported to Midwest City Regional Hospital with a gunshot wound to her buttocks. Jackson was interviewed at the hospital by OCPD Officer Aaron Richards. Jackson told Richards that Jimmy Lee **BROOKS** was the man who had assaulted her and shot her. Jackson stated she is currently living with **BROOKS**, her boyfriend of four years,

and the two of them went to the Mid K Beauty Supply store together. While there, Jackson stated that another male, whom she had not seen in a long time, was also in the store. Jackson and the male greeted one another with a hug, which made **BROOKS** angry, which began the altercation. Jackson then confirmed what Officer Richards had observed on the video surveillance. Jackson explained that she did not know the driver of the black vehicle prior to this incident, and she had simply hopped in the vehicle in order to escape. Jackson also stated that after leaving the parking lot she heard **BROOKS** begin to shoot and felt the injury to her left buttocks.

8. According to Jackson, she did not report to a hospital closer to the incident for fear that **BROOKS** would find her and kill her. Jackson also stated that **BROOKS** threatened her children and family members during the argument, and she believes **BROOKS** will follow through on those threats.

9. Officer Richards later identified Hycinthia Thompson as the driver of the vehicle that Jackson had escaped in. Thompson told Officer Richards that she had observed a male chasing a female and told the female to get in her vehicle. After Jackson got in the vehicle, Thompson


drove away on 23rd Street and heard one gunshot. Immediately after the gunshot, Thompson stated that Jackson told her she had been shot. And upon examining Thompson's vehicle, police found a bullet hole in the license plate. It appears the bullet traveled through the license plate and into the passenger area of the vehicle, striking Jackson in the left buttocks.

10. Police recovered eight .380 caliber shell casings in the parking lot and in the outside, westbound lane of NE 23rd St. ATF has identified one of the shell casings recovered from the scene as having been manufactured by Federal. According to ATF Special Agent Brendan Taylor, an interstate firearms nexus expert, the shell casing would have therefore been manufactured outside the state of Oklahoma, meaning it crossed state lines to reach the state of Oklahoma, thereby affecting interstate commerce.

11. On March 26, 2020, I conducted a search of the Oklahoma Department of Corrections website and learned that **BROOKS** has at least one prior conviction for a crime punishable by a term of imprisonment exceeding one year, specifically, Oklahoma County case number CF-2008 -4263. I reviewed the docket information in this case,

learned that **BROOKS** was present for all pertinent court proceedings, and therefore believe that he had knowledge of his prohibiting conviction.

12. Based upon the aforementioned facts and circumstances, I believe that probable cause exists that on or about March 18, 2020, in Oklahoma City, Oklahoma, in the Western District of Oklahoma, **Jimmy Lee BROOKS**, with knowledge that he had previously been convicted of a felony offense punishable by a term of imprisonment exceeding one year, did possess ammunition in violation of Title 18, United States Code, Section 922(g)(1).



CHAD R. OUBRE
Special Agent, Bureau of Alcohol,
Tobacco, Firearms, and Explosives

Sworn and subscribed before me this 30th day of March, 2020.



SUZANNE MITCHELL
United States Magistrate Judge